

**ORIGINAL**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

MARGUERITE CARRUBBA,  
Plaintiff,

VERSUS CIVIL ACTION NO: 1:07cv1238

HARRISON COUNTY, MISSISSIPPI,  
by and through its Board of  
Supervisors; HARRISON COUNTY  
SHERIFF, George Payne;  
WAYNE PAYNE; DIANE GATSON RILEY;  
STEVE CAMPBELL; RICK GATSON;  
RYAN TEEL; KARLE STOLZE;  
WILLIAMS PRIEST; JAMES A.  
GONDLES, JR; AMERICAN  
CORRECTIONAL ASSOCIATION;  
JOHN AND JANE DOES 1-3; HEALTH  
ASSURANCE, LLC AND J.L. WHITE,  
Defendants.

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**DEPOSITION OF KARL STOLZE**

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Taken at the offices of Dukes, Dukes,  
Keating & Faneca, 2909 13th Street,  
Sixth Floor, Gulfport, Mississippi, on  
Tuesday, September 22, 2009, beginning  
at 8:36 a.m.

**REPORTED BY:**

F. DUSTY BURDINE, CSR No. 1171  
Simpson Burdine & Miguez  
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**EXHIBIT**

SIMPSON B

88-3130

"E"

1 10:49:23.

2 THE WITNESS:

3 I'm on the left. You can see her pants  
4 here just barely.

5 MR. GEWIN:

6 Q. Do you recall why Ms. Carrubba was  
7 moving from that female holding cell?

8 A. Being disruptive.

9 Q. All right. Now, who is that in the  
10 picture to the right of Ms. Carrubba?

11 A. As I just stated a second ago, that  
12 would be Priest, and I'm on the left.

13 Q. All right. Did Ms. Carrubba have  
14 handcuffs on as she went in the door?

15 A. Yes.

16 Q. Was she handcuffed behind her back or in  
17 front?

18 A. Back. Because this is the point where  
19 we went to -- asked her to exit out of the cell  
20 and then tell her we were going to handcuff her  
21 and she pulled away.

22 MR. BRENDDEL:

23 10:50:08.

24 THE WITNESS:

25 And as you can see, all we did was just